

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT T. KNOX, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

-against-

AGRIA CORPORATION, GUANGLIN LAI,
KENNETH HUA HUANG, GARY KIM TING
YEUNG, ZHAOHUA QIAN, ZHIXIN XUE,
GEOFFREY DUYK, TERRY MCCARTHY,
JASMINE MARRERO, BROTHERS CAPITAL
LIMITED, CREDIT SUISSE SECURITIES
(USA) INC., PIPER JAFFRAY & CO. and CIBC
WORLD MARKETS CORP.,

Defendants.

08 Civ. _____

[Related Cases: 08-cv-03536,
08-cv-03886, 08-cv-04456]

**STATEMENT OF RELATED CASE
PURSUANT TO LOCAL RULE
1.6(A)**

[Removed from:
Supreme Court of the State of New York
County of New York
Index No. 602263/08]

Pursuant to Rule 1.6(a) of the Local Rules of the United States District Court for the Southern District of New York, defendant Agria Corporation ("Agria") requests that the above-captioned action, filed in the Supreme Court of The State of New York, County of New York, on August 4, 2008 and removed to this Court on August 29, 2008, be designated as a related case to the following civil cases now pending before Honorable William H. Pauley, III, United States District Judge, Southern District of New York:

- *Lintz v. Agria Corporation, et al.*, Case No. 08-cv-03536, filed in the United States District Court for the Southern District of New York on April 11, 2008;
- *LeBlanc, et al. v. Agria Corporation, et al.*, Case No. 08-cv-03886, filed in the United States District Court for the Southern District of New York on April 24, 2008; and

- *Lodermier v. Agria Corporation, et al.*, Case No. 08-cv-04456,
filed in the United States District Court for the Southern District of
New York on May 13, 2008.

This action and the three related actions were brought on behalf of the same purported plaintiff class, have common defendants and legal claims for relief, and they arise out of a common nucleus of operative facts. In particular, each of these actions asserts claims against Agria and some or all of the other defendants under Sections 11, 12(a)(2) and/or 15 of Securities Act of 1933. In fact, the allegations of this action and the related actions are essentially identical. Because the actions are in all material respects identical, assignment to a single district judge would effect a saving of judicial effort and other economies.

For these reasons, Agria respectfully requests that this case be designated as related to the civil cases referenced above, and be assigned to Judge Pauley.

Dated: New York, New York
August 29, 2008

Respectfully submitted,
LATHAM & WATKINS LLP

By 

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